



Sullivan & Worcester LLP  
1633 Broadway  
New York, NY 10019

T 212 660 3000  
F 212 660 3001  
www.sandw.com

July 9, 2013

**By Hand**

Hon. Shira A. Scheindlin  
United States District Court  
Southern District of New York  
500 Pearl St., Room 1620  
New York, NY 10007

Re: *Sekisui America Corporation v. Hart*, 12 CV 3479 (SAS) (FM)

Dear Judge Scheindlin:

We represent defendants Richard Hart and Marie Louise Trudel-Hart (the "Harts") in the above-referenced action. We write to request a brief extension of the discovery schedule to which plaintiffs do not object.

Pursuant to the Scheduling Order entered by the Court on January 18, 2013, the deadline to complete all discovery is July 31, 2013. On July 3, 2013, Plaintiffs served three expert reports. The reports total 153 pages and cite approximately 750,000 pages of documents. The Harts' experts will require more than two weeks to respond adequately to this volume of information. The Harts therefore respectfully request that the deadline for rebuttal expert reports be August 2, 2013 and the deadline for all expert discovery be August 30, 2013.

This is the first request for an extension of the discovery schedule in this case. We confirmed by email exchange with plaintiffs today that they do not object to this request.

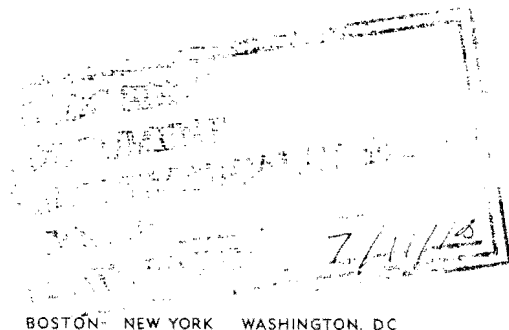
Respectfully submitted,

Franklin B. Velie

Direct line: (212) 660-3037  
fvelie@sandw.com

Enclosure

cc: Karen L. Hagberg, Esq.  
Craig B. Whitney, Esq.



Request Granted. The deadline for rebuttal expert reports is now August 2, 2013 and all expert discovery is now due by August 30, 2013

S. J. [Signature]  
[Signature]  
7/10/13